

THE LAW OFFICES OF  
**FAUSTO E. ZAPATA, JR., P.C.**

Broadway Chambers Building  
277 Broadway, Suite 501  
New York, New York 10007

Te : 212-766-9870 / Fax: 212-766-9869  
Ema : fz@fzapataaw.com  
Web: www.LaborEmploymentLawFirm.com

March 21, 2024

Hon. Edgardo Ramos  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: Placido Escoto v. Allerton Realty Group LLC, et  
al., SDNY Civil Case No. 22 Civ. 8722

Dear Judge Ramos,

Our office represents Plaintiff Placido Escoto ("Plaintiff") in the above referenced matter in the above referenced matter. Plaintiff's claims, under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 201, et seq., and New York Labor Law ("NYLL"), are based on allegations that Defendants Allerton Realty Group, LLC, Kamran Abrishamian, and Ben Dash (hereinafter collectively referred to as "Defendants") failed to pay Plaintiff minimum and overtime wages in addition to related New York Labor Law claims.

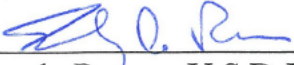
On February 13, 2024, the Court directed the parties to submit settlement submissions by March 13, 2024. On behalf of the parties, we apologize to the Court for missing this deadline. Unfortunately, the parties are still finalizing the settlement agreement language and are jointly requesting an expansion of time to April 3, 2024, to file the settlement papers.

Thank you in advance for your consideration.

Respectfully,

s/Fausto E. Zapata, Jr.  
Fausto E. Zapata, Jr.

The application is X granted  
\_\_\_\_\_ denied

  
\_\_\_\_\_  
Edgardo Ramos, U.S.D.J  
Dated: March 21, 2024  
New York, New York